

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY LEONARD, IN HIS CAPACITY AS
TRUSTEE OF THE POPLAWSKI 2008
INSURANCE TRUST; PHYLLIS POPLAWSKI;
and PBR PARTNERS, on behalf of themselves
and all others similarly situated,

Plaintiffs,

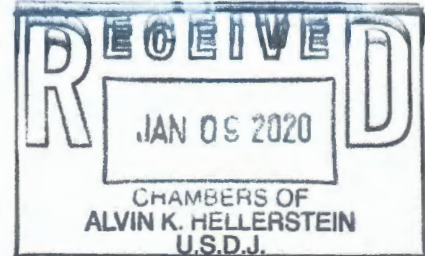
vs.

JOHN HANCOCK LIFE INSURANCE
COMPANY OF NEW YORK and JOHN
HANCOCK LIFE INSURANCE COMPANY
(U.S.A.),

Defendants.

Civil Action No.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 1/10/2020
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**MOTION TO FILE UNDER SEAL PORTIONS OF THE DISCOVERY DISPUTE
LETTER DATED JANUARY 7, 2020**

Plaintiffs Jeffrey Leonard, Phyllis Poplawski and PBR Partners respectfully request that the Court authorize the sealed filing of a portion of the letter dated January 7, 2020, including Exhibits 1-3, 5-22, and A-B, concerning a discovery dispute. Plaintiffs make this request solely on Defendants' behalf.

Defendants and third parties have designated the proposed sealed portions of the letter and Exhibits as "Confidential," and contend that these portions must be filed under seal pursuant to ¶¶10-11 of the Stipulated Confidentiality Agreement and Protective Order (the "Protective Order"), entered by this Court on November 13, 2018. (Docket No. 39.) As per ¶ 12 of the Protective Order, Defendants and the third parties may move to maintain the continued sealing of the sealed material within twenty-one days of this filing. By making this filing, Plaintiffs do not agree that any of the sealed material should be maintained under seal, and Plaintiffs reserve the

Denied. A stip'n to seal does not justify an exception to the ordinary rule of public filing. 1/10/2020
Alvin K. Hellerstein

right to oppose any motion Defendants or any third party ultimately files seeking the continued sealing of the sealed material.

Dated: January 7, 2020

/s/ Seth Ard

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